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Via ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Benjamin, No. S2 21 Cr. 706 (JPO)

Dear Judge Oetken:

We write on behalf of our client Brian Benjamin to respectfully request a modification to the conditions of his release to include the Northern and Western Districts of New York and Washington, D.C. for work-related travel. Mr. Benjamin will continue to abide by all conditions of supervision. The government, by Assistant United States Attorney Jarrod Schaeffer, and Pretrial Services, by Officer Jazzlyn Harris, have advised that they have no objection to this request.

Respectfully submitted,

/s/ Barry H. Berke

Barry H. Berke
Dani R. James

cc: All Counsel (via ECF)